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MEMORANDUM

TO: Raymond E. Hopkins
Commissioner
Virginia Department for the Blind and Vision Impaired

FROM: Pamela B. Beckner
Assistant Attorney General

DATE: December 14, 2018

SUBJECT: Periodic Review and Small Business Impact Review
Regulations Governing Deaf-Blind Services
(22 VAC 45-100)

In accordance with Virginia Code §§ 2.2-4007.1 and 2.2-4017 and Executive Order 14 (as amended July 16, 2018), I have reviewed the Department for the Blind and Vision Impaired's *Regulations Governing Deaf-Blind Services*, 22 VAC 45-100. These regulations are undergoing periodic review and a small business impact review. In my opinion, as counsel to the Department, the Commissioner had the authority under Virginia Code § 51.5-65 to adopt the current regulations, and the Commissioner has the authority to amend the regulations.